

1 E. MARTIN ESTRADA
United States Attorney
2 MACK E. JENKINS
Assistant United States Attorney
3 Chief, Criminal Division
SEAN D. PETERSON
4 Assistant United States Attorney
Chief, Riverside Branch Office
5 TRITIA L. YUEN (Cal. Bar No. 255468)
Assistant United States Attorney
6 Riverside Branch Office
3403 Tenth Street, Suite 200
7 Riverside, CA 92501
Telephone: (951) 276-6222
8 Facsimile: (951) 276-6202
E-mail: tritia.yuen2@usdoj.gov
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Attorneys for Plaintiff
10 UNITED STATES OF AMERICA

11 UNITED STATES DISTRICT COURT

12 FOR THE CENTRAL DISTRICT OF CALIFORNIA

13 UNITED STATES OF AMERICA,

14 Plaintiff,

15 v.

16 JI RYANG CHAE, and
JASMINE DAKOTA BEVERLY,

17 Defendants.
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No. ED CR 23-00131-MCS-2

JOINT DISCOVERY STATEMENT FOR
DEFENDANT JASMINE DAKOTA BEVERLY

TRIAL DATE: 9/26/23

TRIAL TIME: 8:30 a.m.

LOCATION: Courtroom of the Hon.
Mark C. Scarsi, 7C

21 Plaintiff United States of America, by and through its counsel
22 of record, the United States Attorney for the Central District of
23 California and Assistant United States Attorney Tritia L. Yuen, and
24 defendant Jasmine Dakota Beverly ("defendant"), by and through her
25 counsel of record, Oliver Cleary, hereby respectfully submit a joint
26 discovery statement for defendant Jasmine Dakota Beverly, as required
27 by the Court's Initial Standing Order for Criminal Cases Assigned to
28 Judge Mark C. Scarsi.

1 **A. Status of Discovery**

2 1. On August 4, 2023, the government provided to defense
3 counsel a draft stipulation for protective order in this matter. The
4 government believes that a protective order is needed given the
5 personal identifying information, reference to minor victims' family
6 members, and cooperating witness information. On August 16, 2023,
7 the parties conferred regarding the stipulation for protective order
8 and expect to file the stipulation for protective order soon.

9 2. On August 4, 2023, the government produced its initial
10 discovery to defendant, which it believes do not require a protective
11 order, consisting of approximately 470 pages documents, including law
12 enforcement reports, and two spreadsheets. The government
13 anticipates producing additional discovery once a protective order is
14 in place. On or about August 16, 2023, counsel for the government
15 and defense met and conferred telephonically on this matter. Defense
16 counsel indicated he was still reviewing the proposed stipulation for
17 a protective order. If this matter proceeds to trial, and to the
18 extent additional discoverable materials are obtained by the
19 government, the government will produce such materials to defendant
20 in accordance with the government's continuing discovery obligations,
21 established law, and the Court's order.

22 **B. Discovery Disputes**

23 3. At this time, there are no contested matters of discovery
24 and inspection. The parties reserve the right to raise discovery
25 issues with the Court if they arise at a later date.
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1 **C. Contemplated Motions**

2 4. At this time, the parties do not anticipate filing any
3 pretrial motions. The parties reserve the right to file additional
4 motions to be heard at the motion hearing date if the need arises.

5 **D. Current Trial Date**

6 5. Counsel anticipate a trial continuance, but the parties
7 have not yet reached an agreement on a date to continue the trial.

8 **E. Contemplated Trial Length**

9 6. The parties anticipate a trial in this matter (voir dire
10 through closing arguments) will last approximately seven to eight
11 days).

12 Dated: August 17, 2023

Respectfully submitted,

13 E. MARTIN ESTRADA
14 United States Attorney

15 MACK E, JENKINS
16 Assistant United States Attorney
 Chief, Criminal Division

17 SEAN D. PETERSON
18 Assistant United States Attorney
 Chief, Riverside Branch Office

19 /s/ Tritia L. Yuen
20 TRITIA L. YUEN
21 Assistant United States Attorney
22 Attorneys for Plaintiff
 UNITED STATES OF AMERICA

23 /s/ via e-mail authorization
24 OLIVER CLEARY
25 Attorney for Defendant
26 JASMINE DAKOTA BEVERLY
27
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